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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOEL LUBRITZ

Plaintiff,

vs.

AIG CLAIMS, INC., a Delaware
Corporation; DOES I through X,
inclusive; ROE CORPORATIONS I through
X, inclusive; ROE LIMITED LIABILITY
COMPANIES I through X, inclusive,

Defendant.

)
) Case No.: 2:17-cv-02310-APG-NJK
)
) **STIPULATION AND**
) **ORDER RE: EXTENSION OF TIME**
) **FOR PLAINTIFF TO FILE OPPOSITION**
) **TO DEFENDANT AIG CLAIMS, INC.'S**
) **MOTION FOR SUMMARY JUDGMENT**
) **[ECF NO 24]**
)
) **[FIRST REQUEST FOR EXTENSION]**
)

Pursuant to Local Rules IA 6-1 and 6-2, Plaintiff Joel Lubritz ("Plaintiff"), and Defendant AIG Claims, Inc. ("Defendant") hereby stipulate to extend the time for Plaintiff to file his Opposition to Defendant AIG Claims, Inc.'s Motion for Summary Judgment [ECF No. 24].

On March 30, 2018, Defendant filed its Motion for Summary Judgment [ECF No. 24]. Plaintiff's Opposition is scheduled to be due on Friday, April 20, 2018 but, because Plaintiff's counsel is scheduled to begin voir dire in the matter of *Elaine P. Wynn v. Stephen A. Wynn et al.*, Case No. A-12-656710-C, Plaintiff's counsel respectfully requests a ten (10) day extension in which to file the Opposition. Plaintiff submits that good cause exists to approve this stipulation because of his counsel's current trial schedule and, moreover, because the Parties are currently

1 scheduled to argue Plaintiff's Motion to Compel the Production of An Unredacted Copy of
2 Defendant's Claims Notes Pursuant to FRE 612 [ECF No. 18] on April 16, 2018 at 2:00 p.m. Thus,
3 the instant stipulation will allow Plaintiff's Motion to Compel to be resolved and, if necessary,
4 additional discovery documents to be produced before Plaintiff's Opposition would be due so that
5 Plaintiff would not need to seek relief pursuant to FRCP 56(f). Finally, granting this extension will
6 not require the Court to alter any hearing date on Defendant's Motion for Summary Judgment as no
7 such hearing date has been set.

9 Based on the foregoing, the Parties hereby stipulate and request that the Court issue an
10 Order extending the deadline for Plaintiff to file his Opposition to Defendant's Motion for
11 Summary Judgment [ECF No. 24] by no later than April 30, 2018.

12 IT IS SO STIPULATED.

13 DATED: April 16, 2018

TYSON & MENDES LLP

14 By /s/ Carrie McCrea Hanlon
15 Carrie McCrea Hanlon, Esq. (3902)
16 3960 Howard Hughes Parkway, Suite 600
17 Las Vegas, Nevada 89169
Attorneys for Defendant AIG Claims, Inc.

18 DATED: April 16, 2018

CAMPBELL AND WILLIAMS

19 By /s/ Samuel R. Mirkovich
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22 700 South Seventh Street
23 Las Vegas, Nevada 89101
24 Attorneys for Plaintiff

25 **ORDER**

26 Based on the Stipulation between Plaintiff and Defendant [ECF No. 25], which I treat as a
27 joint motion under LR 6-1(a), **IT IS SO ORDERED.**

28  4/16/2018
UNITED STATES DISTRICT JUDGE